

REMARKS

Claims 32-50 are pending for examination with claims 32 and 50 being independent claims. No claims have been amended or cancelled. No new claims have been added.

Rejections Under 35 U.S.C. §103

The Office Action rejected claims 32 and 50 under 35 U.S.C. §103(a) as being unpatentable over U.S. Publication No. 2004/0120101 to Cohen et al. (hereinafter Cohen et al.) in view of U.S. Patent No. 5,915,016 to Savalle et al. (hereinafter Savalle et al). In response, Applicant respectfully asserts that both Cohen and Savalle, either alone or in proper combination, do not teach or suggest all of the limitations of claims 32 and 50 and submits the following remarks.

Claim 32 recites, “A chip card contact module comprising: a chamber for receiving a chip card, the chip card having a contact pad for providing access to data stored on the chip card; a card input slot for accessing the chamber; and a set of contacts within the chamber for contacting the contact pad of a chip card inserted in the chamber; the chip card contact module further comprising a plurality of conductors, each conductor leading away from a respective contact within the chamber to enable connection of the contacts to circuitry for processing data accessed from a chip card, wherein none of said conductors leads from a contact towards the card input slot.”

The Office Action, at page 3, relies on Cohen for an alleged teaching of “a chip card module comprising: (i) a chamber for receiving a chip card (figures 1A, 1B, 1C – smart card reader 15); (ii) a card input slot for accessing for accessing [*sic*] the chamber (figures 1A, 1B, 1C); (iii) a plurality of conductors (34, figure 1C; 52, figure 2; par. 0019, 0023, 0024).” The Office Action, at page 3, also states that “The claim differs in calling for a set of contacts in a card reader for contacting the contacts of a smart [*sic*] card. Though Cohen discloses a smart card reader, there is no specific reference in Cohen’s teaching regarding the contacts...Reference to Savalle is cited as an evident showing the conventionality of a card reader having a pluralities of contacts for contacting the contacts of a smart card (figure 1).” Applicant respectfully disagrees.

Cohen discloses an electronic circuit assembly including a plurality of printed circuit boards including electrical circuits and electronic components mounted on at least one of the plurality of printed circuit boards in electrical communication with the electrical circuits, wherein at least some of the plurality of printed circuit boards define an anti-tamper enclosure

for at least some of the electronic components. (Abstract). As described by Cohen, the anti-tamper enclosure 30 is formed of conventional multi-layer printed circuit boards 32, 40 which include at least one layer of an electrical conductor pattern 34, 52. The electrical conductor pattern 34, 52 is configured to provide an output indication of tampering when shorted, with itself or other circuitry in the printed circuit board 32, 40. (paragraphs 19 and 23).

However, nowhere does Cohen disclose that the electrical conductor pattern 34, 52 enables connection of contacts to circuitry for processing data accessed from a chip card, as recited in claim 32. In fact, as disclosed by Cohen, the anti-tamper enclosure 30 is configured to prevent access to data critical components from external sources (e.g., via smart card reader 15). For example, as described in paragraph 24 of Cohen, the conductors in conductor pattern 60 are arranged such that any short or interruption produced by tampering therewith changes the electrical characteristic thereof. Therefore any connection by a source external to the anti-tamper enclosure 30 (e.g., by a chip card via smart card reader 15) would cause the conductor pattern 34, 52, 60 to provide an indication of tampering. Thus, it is not possible for the electrical conductor pattern 34, 51, 60 to enable connection of contacts to circuitry for processing data accessed from a chip card, as recited in claim 32.

The Office Action also fails to address all of the elements of claim 32. Claim 32 recites, “the chip card contact module further comprising a plurality of conductors, **each conductor leading away from a respective contact** within the chamber to enable connection of the contacts to circuitry for processing data accessed form a chip card, wherein **none of said conductors leads from a contact towards the card input slot.**” However, the Office Action only cites to Cohen as allegedly teaching “a plurality of conductors (34, figure 1C; 52, figure 2; par. 0019, 0023, 0024).” Nowhere, either alone or in proper combination, does Cohen or Savalle teach or suggest “...each conductor leading away from a respective contact within the chamber to enable connection of the contacts to circuitry for processing data accessed form a chip card, wherein none of said conductors leads from a contact towards the card input slot”, as recited in claim 32.

Also, the Office Action, at page 3, admits that “there is no specific reference in Cohen’s teachings regarding the contacts.” In addition, Savalle fails to cure the deficiencies of Cohen. Savalle discloses a portable telephone having a keypad, a screen and a plate under the keypad. An identify card is inserted in a cavity under the plate so as to place it in contact with an identity card connector located under the “navigator” key of the keypad on the opposite side of the plate

to the identify card. (Abstract). However, nowhere does Savalle teach or suggest “the chip card contact module further comprising a **plurality of conductors, each conductor leading away from a respective contact** within the chamber to enable connection of the contacts to circuitry for processing data accessed from a chip card, wherein **none of said conductors leads from a contact towards the card input slot**”, as recited in claim 32.

Accordingly, the rejection of claim 32 under 35 U.S.C. §103 as being unpatentable over Cohen in view of Savalle should be withdrawn.

Claim 50 recites, “A chip card reader comprising a chip card contact module according to claim 32.” As such, claim 50 is patentable for at least the same reasons as claim 32. Accordingly, the rejection of claim 50 under 35 U.S.C. §103 as being unpatentable over Cohen in view of Savalle should be withdrawn.

Allowable Subject Matter

Applicant notes with appreciation that claims 33-49 have been objected to as being dependant upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicant has deferred re-writing claims 33-49 in independent form in view of arguments provided herein regarding the patentability of the independent claim from which they depend.

CONCLUSION

In view of the foregoing amendments and remarks, reconsideration is respectfully requested. This application should now be in condition for allowance; a notice to this effect is respectfully requested. If the Examiner believes, after this amendment, that the application is not in condition for allowance, the Examiner is requested to call the Applicant's attorney at the telephone number listed below.

If this response is not considered timely filed and if a request for an extension of time is otherwise absent, Applicant hereby requests any necessary extension of time. If there is a fee occasioned by this response, including an extension fee that is not covered by an accompanying payment, please charge any deficiency to Deposit Account No. 50/2762.

Respectfully submitted,
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